B.F. Mills & Associates

Attorneys at Law 11715 Fox Road Suite 400-109 Indianapolis, Indiana 46236

August 20, 2020

Re: Sheehy Enterprises, Inc. Case 25-CA30583

Richard D. Hardick Associate Executive Secretary National Labor Relations Board 1099 14th St. NW Washington, D.C. 20570

Dear Sir:

This is in regard to your letter of August 18, 2010 concerning Sheehy Enterprises, Motion concerning Section 102.48 (d)(1) in which a "party to a proceeding before the Board may, because of extraordinary circumstances, move for reconsideration, rehearing, or reopening of the record after the Board decision or order." which also states:

A motion for reconsideration shall state with particularity the material error claimed and with respect to any finding of material fact shall specify the page of the record relied on. A motion for rehearing shall specify the error alleged to require a hearing *de novo* and the prejudice to the movant alleged to result from such error. A motion to reopen the record shall state briefly the additional evidence sought to be adduced, why it was not presented previously, and that, if adduced and credited, it would require a different result. Only newly discovered evidence, evidence which has become available only since the close of the hearing, or evidence which the Board believes should have been taken at the hearing will be taken at any further hearing.

(2) Any motion pursuant to this section shall be filed within 28 days, or such further period as the Board may allow, after the service of the Board's decision or order, except that a motion for leave to adduce additional evidence shall be filed promptly on discovery of such evidence. Copies of any request for an extension of time shall be served promptly on the other parties.

(3) The filing and pendency of a motion under this provision shall not operate to stay the effectiveness of the action of the Board unless so ordered. A motion for reconsideration or rehearing need not be filed to exhaust administrative remedies.

In this case, these requirments we timely met within the 28 days. In fact, I have never received any order from the Board concerning the decisio. David Swider of Bose mcKinney withdrew as the counsel of record on or about August of 2009, and I have been the Attorney of Record on the Appeal to the 7th Circuit. and I have represented Sheehy since that time. Therefore, Sheehy's Motion was timely and well within the required 28 days.

This letter should be considered a Motion for the Board to reconsider the decision as there are a number of extraordinary circumstances, including the Supreme Court's decision that the original decision of the Board and the 7th Circuit was denied and the Board still has never sent the Decision an order to the Counsel representing Sheehy.

Sincerely,

Bruce F. Mills